

July 16, 2024

Jameel Gordon

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Honorable Lawrence J. Villardo

United States District Court - Western District of New York

2 Niagara Street Buffalo, NY 14202

Re: Case Number: 1:23-cv-00640

Jameel Gordon v. The State University at Buffalo, The State University of New York, University at Buffalo Regional Institute, Blackstone Incorporated, Rick Gardner, Keiah Shauku, Hadar Borden, Empire State Development, 43 North, and NYVentures.

Plaintiff's Opposition To Defendant Blackstone Inc.'s Motion To Dismiss

Dear Honorable Lawrence J. Villardo

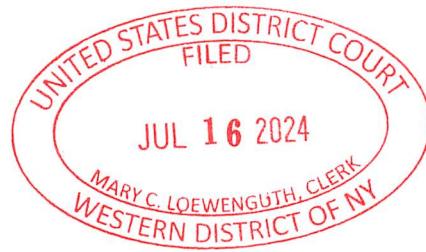
Introduction

Plaintiff, Jameel Gordon, respectfully submits this opposition to Defendant Blackstone Inc.'s Motion to Dismiss. The Plaintiff requests that the Court deny the motion and preserve the current complaint with its defendants until discovery is complete. The Plaintiff contends that discovery is essential to fully understand the nature of the relationships among Blackstone Inc., The Blackstone Charitable Foundation, The State University of Buffalo, and The University of Buffalo Blackstone Launchpad.

Argument

1. The Necessity of Discovery

The Plaintiff asserts that discovery is necessary to elucidate the nature of the relationships between Blackstone Inc. and the aforementioned entities. Without



the opportunity to conduct discovery, the Plaintiff is unable to present a complete picture of the interconnections and potential liabilities.

2. Specific Discovery Requests

The Plaintiff will request the initiation of discovery proceedings, including:

- Production of documents detailing the relationships between Blackstone Inc., The Blackstone Charitable Foundation, The State University of Buffalo, and The University of Buffalo Blackstone Launchpad.
- Interrogatories directed at clarifying the roles and interactions of these entities.
- Depositions of key individuals with knowledge of the relationships and responsibilities of the involved parties.

3. Potential Need for Subpoenas

Should it become necessary, the Plaintiff will request that the Court issue subpoenas to third parties who may possess relevant information regarding the nature of these relationships and the reasons for naming Blackstone Inc. as a defendant. The Plaintiff is prepared to file a motion to compel cooperation in this regard.

Conclusion

For the reasons set forth above, the Plaintiff respectfully requests that the Court deny Defendant Blackstone Inc.'s Motion to Dismiss until the Plaintiff is able to proceed with discovery to fully investigate the relationships and potential liabilities involved in this case.

Respectfully submitted,

Jameel Gordon